ORKIM PERSONAL DATA PROTECTION NOTICE

(Version: November 2026)

1. This Personal Data Protection Notice ("**Notice**") is issued by **ORKIM** to inform our valued customers, suppliers, business partners, contractors, service providers, job applicants, shareholders and investors and visitors to our websites about the manner in which we collect, use, disclose, and protect your personal data, in accordance with the **Personal Data Protection Act 2010 (Act 709)** ("**the Act**").

2. Terms & Definitions

TERM	**DEFINITION**
ORKIM	Refers to ORKIM Berhad and its subsidiaries from time to time, within the meaning of section 4 of the Companies Act 2016.
Personal Data	Any information that relates directly or indirectly to an identifiable individual and is processed or intended to be processed as part of a commercial transaction. This includes Sensitive Personal Data and any expression of opinion about the individual, but excludes data processed solely for credit reporting purposes under the Credit Reporting Agencies Act 2010.
Processing	Refers to any operation or series of operations performed on Personal Data, whether carried out by automated means or otherwise. This includes, but is not limited to, the collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure, or destruction of Personal Data.
Data Controller	A person or an organization that determines the purposes and means of processing personal data.
Data Subject	An individual to whom personal data relates.
Data Processor	An entity that processes Personal Data on behalf of a data controller, but does not process it for their own purposes
Data Protection Officer	Data Protection Officer or any other personnel designated by ORKIM to be responsible for ORKIM's compliance of the Act.
Cross-Border Data Transfer	Transfer of Personal Data to any place outside Malaysia.
Sensitive Personal Data	Any personal data that relates to personal information about an individual's physical or mental health, biometric data, political opinions, religious beliefs, the commission or alleged commission of any offence or other categories as may be prescribed by law.

3. Collection of Personal Data

a) In the course of your interactions with ORKIM, we may collect and process personal information about you. This may occur when you contact us, interact with us, engage our services, supply goods or services to us, apply for employment, or carry out work with or for us. We only collect information that is necessary for us to manage our business operations and fulfil our contractual and legal obligations to you.

b) All Personal Data will be processed in accordance with the principles set out in the Act, including the principles of notice and choice, disclosure, security, retention, access, and data integrity. By submitting your Personal Data to us, engaging our services or entering into a business relationship with us, your consent to the collection, use, processing, and storage of your Personal Data for the purposes and in the manner described in this Notice. Where we need to process your Sensitive Personal Data, we will obtain your explicit consent separately.

c) Depending on your dealings with us, the Personal Data we collect may include:

- Name, identification number, passport number
- Contact details (address, email, telephone number)
- Gender and date of birth
- Employment history, education details and professional certificates (for job applicants)
- Financial details (bank account details for payment purposes)
- Emergency contact information, and health and safety information required for access to our premises, facilities or vessels (where relevant)
- Shareholding information you provide to us (for shareholders and investors) Website usage data, such as IP address, browser type, page visited and cookie data (for website visitors)
- Records of your correspondence and communications with us

4. Why We Collect Your Personal Data

a) We collect and process your Personal Data for the following purposes:

- Responding to your enquiries, requests and complaints;
- Administering and managing services, contracts, and commercial transactions;
- Communicating with you regarding our operations, services, employment opportunities or business engagements;

- Assessing job applications and recruiting staff and seafarers;
- Processing payment transactions;
- Processing supplier registrations, vendor applications and related documentation;
- Conduction due diligence, know-your-customer, anti-money laundering, anti-bribery and sanctions screening on vendors, customers and business partners;
- Ensuring safety, security, and access control at our premises and facilities;
- Complying with applicable laws, regulations and statutory requirements;
- Conducting customer satisfaction survey;
- Conducting audits, investigations, or risk assessments;
- Communication with shareholders and investors, conducting general meetings and meeting our obligations as a listed company;
- Operating, securing and improving our website;
- Carrying out corporate exercise, such as mergers, acquisition, financing or restructuring;
- Notifying you of important operational matters, policy changes, compliance requirements, or information relevant to our business relationship.

b) We will only use your Personal Data for lawful purposes and in accordance with the principles set out in the Act.

5. How We Collect Your Data

We collect your Personal Data directly from you and from the following sources:

a) Application forms, contracts, agreements, tenders, and other documentation submitted to us;

b) Communications through emails, telephone calls, written correspondence, or any other channels;

c) Interactions through our websites, digital or social media platforms, or at any events or activities;

d) Business cards or contact details you provide to our employees;

e) Your employer or the company you represent, recruitment agencies and manning agencies;

f) Our share registrar and Bursa Malaysia Depository Sdn Bhd (for shareholders);

g) Publicly available sources, such as company registries, Bursa Malaysia announcements and sanctions lists;

h) Cookies and analytics tools on our website;

i) Closed-circuit television (CCTV) recordings at our premises, facilities and vessels;

j) Third-party references or background checks such as credit reporting agencies, subject to your prior consent.

6. Consequences of Not Providing Your Data

The provision of certain Personal Data is necessary for us to carry out our business operations and comply with legal and regulatory requirements. If you choose not to provide the required Personal Data, it may:

a) Prevent us from processing your job application, vendor registration, or other business-related requests;

b) Affect our ability to fulfil contractual or legal obligations or provide services to you;

c) Restrict access to our premises, facilities, project sites or services due to safety, security or regulatory requirements.

7. Disclosure of Your Personal Data

We keep your Personal Data confidential and protect it in accordance with the Act. We share it only on a need-to-know basis, for the purposes in this Notice, with the following classes of third parties:

a) **Government and Regulatory Authorities -** such as the Inland Revenue Board (LHDN), Marine Department Malaysia, ports, flag-state and immigration authorities Malaysian Anti-Corruption Commission (MACC), or other enforcement agencies, where disclosure is required or permitted by law.

b) **Appointed Service Providers and Contractors** – including IT, cloud hosting and website analytics providers, recruitment agencies and manning agents, screening service providers, insurance companies and P&I Clubs, training providers, auditors, or consultants who act on our behalf under contractual obligations.

c) **Business Partners and Clients** – including charterers and vetting bodies, in relation to joint ventures, collaborative projects, vessel vetting or contractual deliverables (subject to confidentiality or data processing agreements).

d) **Share Registrar and Capital Market Authorities** – our share registrar, Bursa Malaysia and Securities Commission Malaysia, in relation to shareholders and investors.

e) **Legal and Professional Advisers** – including law firms, risk consultants, and external auditors engaged to assist with investigations, dispute resolution, or compliance reviews.

f) **Banks and Financial Institutions** – for claims processing and payment transactions.

g) **Internal Departments or Subsidiaries within ORKIM Group** – solely for operational, administrative and compliance purposes consistent with the original purpose of collection.

h) **Emergency Responders or Health Providers** – where necessary to protect life, health, or safety.

i) **Prospective Purchasers, Investors or Financiers** – in connection with a merger, acquisition, financing or restructuring, subject to confidentiality obligations.

j) **Third Parties with Your Explicit Consent** – where you have been informed and agreed to the disclosure.

8. Data Protection & Security

We take practical technical, physical and administrative steps to protect your Personal Data against unauthorized access, loss, misuse, alteration or destruction. Access to Personal Data is strictly limited to authorized personnel for legitimate business purposes.

9. Data Retention

a) ORKIM will retain your Personal Data for as long as it is necessary to fulfil the purposes for which it was collected or as required or permitted by law. Once your Personal Data is no longer required, it will be securely disposed of, deleted, or anonymized in accordance with our internal data retention and disposal policies.

b) The retention period may vary depending on the nature of the Personal Data and the purpose for which it was collected, including legal, regulatory, operational, or audit requirements.

c) Personal Data in job application will be kept until the recruitment exercise is completed. Where you agree, we may keep your application for 12 months to consider you for other suitable vacancies, after which it will be securely deleted.

10. Cookies

Our website use cookies to function properly, remember your preferences and help us understand how visitors use them, including analytics tools. You can block or delete cookies through your browser settings, although some parts of our website may not work properly if you do.

11. Cross-Border Data Transfer

In the course of our operations, it may be necessary for ORKIM to transfer your Personal Data to locations outside Malaysia, including to our subsidiaries, affiliates, suppliers, contractors, service providers, or business partners operating in other jurisdictions. This includes the use of service providers, such as cloud hosting providers, whose servers are located outside Malaysia.

When your Personal Data is transferred outside Malaysia, ORKIM will ensure that appropriate safeguards are in place to protect your Personal Data in accordance with this Notice and the Act. We will only transfer your Personal Data to a place outside Malaysia that has in force a law substantially similar to the Act, or that ensures an adequate level protection at least equivalent to that afforded by the Act, or where another exception under section 129 of the Act applies, such as your consent or the performance of contract with you.

12. Your Rights

As a data subject, you have the following rights under the Act:

- **Right of Access**: You may request access to your Personal Data held by ORKIM to understand how it is being processed and used.

- **Right to Correction**: You may request correction or update of any Personal Data that is inaccurate, outdated, incomplete, or misleading.

- **Right to Withdraw Consent**: You may withdraw your consent to the processing of your Personal Data. However, this may affect our ability to continue providing certain services or fulfilling contractual obligations, subject to legal or operational constraints.

- **Right to Limit Processing**: You may request to limit or restrict the way your Personal Data is used, especially for non-essential purposes such as direct marketing. You may ask us to limit the processing of your Personal Data, including Personal Data relating to the other persons who may be identified from it, by writing to the Data Protection Officer or using the unsubscribe link in our emails.

- **Right to Data Portability**: You may ask us to transmit your Personal Data to another data controller, where this is technically feasible and the data format is compatible, subject to verification and legal requirements.

To exercise any of these rights or for any enquiry or complaint about Personal Data, please write to:

Data Protection Officer
ORKIM BERHAD
Level 15, Menara TSR No.12, Jalan PJU 7/3 Mutiara Damansara 47810, Petaling Jaya, Selangor Darul Ehsan, Malaysia
Email: dpo@orkimship.com

We will respond to your request within twenty-one (21) days of receiving it, as required by the Act. If you are not satisfied with our response, you may lodge a complaint with the Personal Data Protection Commissioner.

13. Data Breach Notification and Reporting

Where required by the Act, ORKIM will notify the Personal Data Protection Commissioner and affected individuals of a Personal Data breach.

14. Update of the Personal Data Protection Notice

We may revise or update this notice from time to time to reflect changes in our practices and policies, legal requirements, or operational needs. The latest version will be available on our website or upon request.

15. Language

This policy is issued in both English and Bahasa Malaysia. In the event of any inconsistency between the two versions, the English version shall prevail.